

# Exhibit 10

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14 to 17

<p style="text-align: right;">Page 14</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 privacy training, to recruitment trainings on our</p> <p>2 systems and processes, to candidate management</p> <p>3 training and company trainings that would include,</p> <p>4 you know, all-encompassing recruitment processes</p> <p>5 including level, what to look for in candidates'</p> <p>6 background, skill sets, things like that.</p> <p>7 Q. Did you receive any training related</p> <p>8 to compensation or setting compensation?</p> <p>9 A. Yes.</p> <p>10 Q. Did you receive any training related</p> <p>11 to anti-bias?</p> <p>12 A. Yes.</p> <p>13 Q. And did you receive any training</p> <p>14 related to discrimination?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Did you receive trainings</p> <p>17 related to particular systems used at Google?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Did you receive trainings in</p> <p>20 GHire?</p> <p>21 A. Yes.</p> <p>22 Q. And how about Thrive?</p> <p>23 A. No, I did not have training in</p> <p>24 Thrive.</p> <p>25</p>	<p style="text-align: right;">Page 16</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 MS. GELFAND: Okay.</p> <p>2 Q. So what was your role as the</p> <p>3 recruiter for the technical director role in OCTO?</p> <p>4 A. I was the lead recruiter on the</p> <p>5 hiring project.</p> <p>6 Q. And when did you become aware that</p> <p>7 OCTO was looking to hire for the technical</p> <p>8 director role?</p> <p>9 A. In 2016. I can't recall the month.</p> <p>10 Q. And was Will Grannis the hiring</p> <p>11 manager for that role?</p> <p>12 A. Yes.</p> <p>13 Q. And did you -- did you meet with Mr.</p> <p>14 Grannis to discuss recruitment for the technical</p> <p>15 director position?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Can you tell me everything you</p> <p>18 recall discussing with Mr. Grannis the scope of</p> <p>19 the technical director position?</p> <p>20 A. So I can't recall the conversation</p> <p>21 verbatim, but I do recall meeting with Will and</p> <p>22 discussing him structuring a job description which</p> <p>23 would be for hiring a reasonably large volume of</p> <p>24 technical director level candidates into Google on</p> <p>25</p>
<p style="text-align: right;">Page 15</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 Q. So at what point did you begin</p> <p>2 supporting the Office of the CTO or OCTO?</p> <p>3 A. I believe it was at some point during</p> <p>4 the beginning of 2016.</p> <p>5 Q. Okay. So let's focus on when you</p> <p>6 were supporting OCTO and specifically about the</p> <p>7 technical director office of the CTO position, and</p> <p>8 I'm going to call it technical directors going</p> <p>9 forward. Is that okay?</p> <p>10 A. Yes.</p> <p>11 Just -- you're slightly muffled in</p> <p>12 the audio. I think it's because we're trying to</p> <p>13 -- I can hear you, but I'm just having to listen</p> <p>14 carefully so that might --</p> <p>15 MR. GAGE: I think it may be at your</p> <p>16 end, Shira, too, because I hear you, but</p> <p>17 you're a little distant.</p> <p>18 MS. GELFAND: Okay, that's fine. Let</p> <p>19 me know if this is better. Is this better?</p> <p>20 MR. GAGE: It's better. As you lean</p> <p>21 a little forward like you're right now, I can</p> <p>22 hear you clearly.</p> <p>23 MS. GELFAND: Okay, I will project.</p> <p>24 MR. GAGE: Now that works.</p> <p>25</p>	<p style="text-align: right;">Page 17</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 the individual contributor ladder at L 8 and L 9.</p> <p>2 Q. Okay, and can you tell me everything</p> <p>3 that you recall Mr. Grannis saying about the</p> <p>4 leveling of the role?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. I don't recall specifics.</p> <p>7 Q. Okay, and did you work with Mr.</p> <p>8 Grannis to come up with the external job posting</p> <p>9 for the technical director role?</p> <p>10 A. I did.</p> <p>11 Q. Okay, and what was your role in</p> <p>12 drafting that job posting?</p> <p>13 A. To make sure it was compliant,</p> <p>14 inclusive, and formatted correctly for sharing</p> <p>15 online and -- and sharing externally with</p> <p>16 non-Googleers.</p> <p>17 Q. What do you mean by "compliant" and</p> <p>18 "inclusive"?</p> <p>19 A. To make sure our minimum</p> <p>20 qualifications and preferred qualifications were</p> <p>21 in line with our company policy.</p> <p>22 Q. Okay. Okay. Is there anything else</p> <p>23 that you recall discussing with Mr. Grannis in</p> <p>24 terms of what the role would entail?</p> <p>25</p>

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<p style="text-align: right;">Page 26</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>MR. GAGE: Objection.</p> <p>A. I do not know.</p> <p>Q. And so were there minimum qualifications that candidates had to meet for this technical director role?</p> <p>A. Yes.</p> <p>Q. And what were those minimum qualifications?</p> <p>A. They're listed on the job description. I would have to refresh by reading it, but the minimum qualifications are documented on the job description.</p> <p>Q. Okay, and where are they documented on the job description?</p> <p>A. On the second page of Exhibit 61, I believe.</p> <p>Q. So would that be under "Skills and Experience Requirements"?</p> <p>A. Correct.</p> <p>Q. Okay, and could Google choose to waive those minimum qualifications?</p> <p>MR. GAGE: Objection. I don't know if I heard the question right. Did you say could or did?</p>	<p style="text-align: right;">Page 28</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>a little confusing, so...</p> <p>Q. Okay. So you had mentioned that this document contains the minimum qualifications for the role in the "Skills and Experience Requirements" section --</p> <p>A. Okay.</p> <p>Q. -- so I'm asking: Where in here does it document the minimum qualifications?</p> <p>A. Well, now I --</p> <p>MR. GAGE: Objection. Go ahead.</p> <p>A. Now that I'm looking at the job description, I realize that the headline where the bullets that's your reading out reside are actually under the "Skills and Experience Requirements" and there's no mention of minimum qualifications in that section of the job description.</p> <p>Q. Okay. So are the minimum qualifications for this job description listed elsewhere?</p> <p>A. They would likely be in GHire.</p> <p>Q. So how did you determine -- I'm sorry, one moment.</p> <p>So if you were to look up the minimum</p>
<p style="text-align: right;">Page 27</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>MS. GELFAND: "Could" they.</p> <p>MR. GAGE: Oh, could. Could, okay. Objection.</p> <p>A. I'm not sure how to answer that.</p> <p>Q. Okay. So let's walk through these minimum qualifications. So the first one says that, "The ideal candidate will have extensive experience co-creating Cloud roadmaps with customers and/or vendors of the CIO, CTO, SVP of engineering levels."</p> <p>MR. GAGE: Objection.</p> <p>Q. Would this be a minimum qualification for the technical director role?</p> <p>A. No.</p> <p>Q. Okay. Would that be a preferred qualification?</p> <p>MR. GAGE: Objection.</p> <p>A. I don't know how to answer that question.</p> <p>Q. Okay, and if you could take a look at that time second bullet point, is that a minimum qualification for the technical director role?</p> <p>MR. GAGE: Objection.</p> <p>A. I'm finding this section of questions</p>	<p style="text-align: right;">Page 29</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>qualifications for the technical director role, where -- where in GHire would that be located?</p> <p>A. It would be under the requirements in GHire where there is a section to input minimum qualifications.</p> <p>Q. Do you recall what those minimum qualifications were with respect to the technical director role?</p> <p>A. I don't.</p> <p>Q. Okay. So how did you determine whether a candidate was a match for the technical director role?</p> <p>MR. GAGE: Objection.</p> <p>A. Maybe you could rephrase.</p> <p>Q. Sure. So when a candidate applied for the technical director position, what factors did you use to determine whether they would be brought in for an interview?</p> <p>A. So there were a number of different factors taken into account. Industry experience would be one of them. The extent of a candidate's experience and years of experience would play a part in that decision. Relevant experience with regard to the specific area of technology and also</p>

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<p style="text-align: right;">Page 30</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 for the industry verticals we were hiring for,</p> <p>2 relevant experience within that domain.</p> <p>3 Q. Anything else?</p> <p>4 A. Educational background is also</p> <p>5 another factor, so we consider.</p> <p>6 Q. Okay. So when you said that years of</p> <p>7 experience played a part in your determination,</p> <p>8 can you speak more about that? What were the</p> <p>9 years of experience that you considered?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. The -- the boundaries of years of</p> <p>12 experience are not concrete, so that's difficult</p> <p>13 to answer.</p> <p>14 Q. Okay, and so at the time that the</p> <p>15 candidates came in for an interview, had you made</p> <p>16 an assessment about their level?</p> <p>17 A. An initial one, yes.</p> <p>18 Q. So this was a preinterview initial</p> <p>19 assessment?</p> <p>20 A. Yes.</p> <p>21 MR. GAGE: Objection.</p> <p>22 Q. Okay. Was there any policy that laid</p> <p>23 out how years of experience translated into level?</p> <p>24 MR. GAGE: Objection.</p> <p>25</p>	<p style="text-align: right;">Page 32</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 level for the technical director role. Did anyone</p> <p>2 else make an assessment at that time?</p> <p>3 A. Yes.</p> <p>4 Q. Who?</p> <p>5 A. The sourcer, Krista Callahan. The</p> <p>6 sourcer; Krista, with a K, Callahan.</p> <p>7 Q. And what was Ms. Callahan's position?</p> <p>8 A. She was Ulku's sourcer, so she was</p> <p>9 the first person that Ulku had contact with and</p> <p>10 engaged with for the role.</p> <p>11 Q. And do you recall what she assessed</p> <p>12 Ms. Rowe's level at?</p> <p>13 A. I recall Level 8.</p> <p>14 Q. Okay, and do you recall what that</p> <p>15 assessment was based on?</p> <p>16 A. You would need to ask Krista that</p> <p>17 question.</p> <p>18 Q. And would that assessment be</p> <p>19 documented anywhere?</p> <p>20 A. Again, Krista may have documentation</p> <p>21 that I'm unaware of.</p> <p>22 Q. Okay, and did you -- did you document</p> <p>23 your assessment of Ms. Rowe's level anywhere?</p> <p>24 A. It may be on certain documents that</p> <p>25</p>
<p style="text-align: right;">Page 31</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I believe there might be some</p> <p>2 documentation around that, but I don't recall the</p> <p>3 detail.</p> <p>4 Q. Okay, and could you deviate</p> <p>5 from -- from that?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. Taking into account other factors</p> <p>8 that we consider in the screening process, yes.</p> <p>9 Q. Okay, and so did you look at that</p> <p>10 documentation that you mentioned at the time that</p> <p>11 you were recruiting for the technical director</p> <p>12 role related to years of experience?</p> <p>13 A. Yes.</p> <p>14 Q. And the years of experience, were</p> <p>15 those bands of years or were they broken down year</p> <p>16 by year?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. They were bands.</p> <p>19 Q. So do you recall with the technical</p> <p>20 director position, what bands equated to which</p> <p>21 level?</p> <p>22 A. I do not.</p> <p>23 Q. Okay. So you stated that you made an</p> <p>24 initial preinterview assessment of a candidate's</p> <p>25</p>	<p style="text-align: right;">Page 33</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 we were considering Ulku at Level 8. I don't</p> <p>2 remember exactly which documents that information</p> <p>3 would reside on.</p> <p>4 Q. Okay, and did you always document</p> <p>5 your assessment, your preinterview assessment, for</p> <p>6 a candidate's level?</p> <p>7 A. Yes.</p> <p>8 Q. And did you review any criteria in</p> <p>9 making that assessment?</p> <p>10 A. Yes.</p> <p>11 Q. And what did you review?</p> <p>12 A. The minimum qualifications and the</p> <p>13 factors that I previously listed when we consider</p> <p>14 where a candidate might fit within the</p> <p>15 organization level-wise.</p> <p>16 Q. Okay, and did you document this in</p> <p>17 GHire?</p> <p>18 A. I don't recall --</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. I don't recall if it's written in</p> <p>21 GHire.</p> <p>22 Q. Do you recall whether it's written</p> <p>23 anywhere else?</p> <p>24 MR. GAGE: Objection.</p> <p>25</p>

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<p style="text-align: right;">Page 42</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 decision-making and it wouldn't -- that wouldn't</p> <p>2 sway things either way.</p> <p>3 Q. Okay. So going down on the same</p> <p>4 document to the first bullet point it says</p> <p>5 "Consistent evaluation for all candidates," do you</p> <p>6 see that?</p> <p>7 A. I do.</p> <p>8 Q. So it says that, "We assess</p> <p>9 candidates against structured rubrics during the</p> <p>10 interview process to ensure consistency and reduce</p> <p>11 bias when evaluating candidates." So was that</p> <p>12 true at the time that you were recruiting for the</p> <p>13 technical director's role?</p> <p>14 A. Just give me a second.</p> <p>15 Yes.</p> <p>16 Q. Okay, and which rubrics did you use?</p> <p>17 A. I don't recall specific documents or</p> <p>18 names of documents, but there will be a rubrics</p> <p>19 that speaks to the Level 8 process and Level 9</p> <p>20 process.</p> <p>21 Q. Okay. So if you had assessed an</p> <p>22 individual at a Level 8 prior to their interview,</p> <p>23 that individual would be assessed according to the</p> <p>24 Level 8 rubric?</p> <p>25</p>	<p style="text-align: right;">Page 44</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 technical director position?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. As far as you were aware, did</p> <p>4 Google -- sorry.</p> <p>5 Did Google have a policy that the</p> <p>6 number of years of work experience dictated the</p> <p>7 level that someone would come in at?</p> <p>8 A. I'm not aware of that policy.</p> <p>9 Q. So what was your understanding of how</p> <p>10 the years of experience of a candidate were</p> <p>11 considered under Google's leveling policy?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. They were only guidelines. They were</p> <p>14 guidelines.</p> <p>15 Q. So Google didn't have a policy that</p> <p>16 someone with a certain number of years of</p> <p>17 experience would automatically come in at a</p> <p>18 certain level?</p> <p>19 A. No.</p> <p>20 Q. So for any role at Google, someone</p> <p>21 with say 17 years of experience could come in as a</p> <p>22 Level 9 if they were being hired for a Level 9</p> <p>23 role?</p> <p>24 A. If they met --</p> <p>25</p>
<p style="text-align: right;">Page 43</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. With consideration --</p> <p>2 MR. GAGE: Objection.</p> <p>3 Go ahead.</p> <p>4 A. With consideration of levels, given</p> <p>5 that this specific job role was spanning two</p> <p>6 levels, the process would include the first levels</p> <p>7 throughout -- it would be inclusive of both Level</p> <p>8 8s and Level 9s throughout.</p> <p>9 Q. So if you had made an initial</p> <p>10 assessment that a candidate was a Level 8, could</p> <p>11 or would -- would the interviewer still look at</p> <p>12 the Level 9 rubric?</p> <p>13 A. Yes.</p> <p>14 Q. Okay, and were these same rubrics</p> <p>15 used for all candidates in the technical director</p> <p>16 position?</p> <p>17 A. Yes.</p> <p>18 Q. Okay, and so continuing where we left</p> <p>19 off in the document, it says "While we do take</p> <p>20 prior experience into consideration, we don't rely</p> <p>21 on company names and job titles to understand a</p> <p>22 candidate's capabilities."</p> <p>23 Did you understand that to be true at</p> <p>24 the time that you were recruiting for the</p> <p>25</p>	<p style="text-align: right;">Page 45</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 MR. GAGE: Objection.</p> <p>2 Q. Sorry?</p> <p>3 A. If they met the criteria for the</p> <p>4 role, then that is possible.</p> <p>5 Q. Okay, and could someone with 25 years</p> <p>6 of experience come in at a Level 7 if they were</p> <p>7 being hired for a Level 7 role?</p> <p>8 A. Yes.</p> <p>9 MR. GAGE: Objection.</p> <p>10 Q. Okay, and so did Google prescribe any</p> <p>11 meaningful difference between someone with 15</p> <p>12 years of experience versus someone with 17 years</p> <p>13 of experience in terms of leveling?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. No.</p> <p>16 Q. Okay. Did Google prescribe any</p> <p>17 meaningful difference between someone with 19</p> <p>18 years of experience versus someone with 20 years</p> <p>19 of experience?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. No.</p> <p>22 Q. Okay. How about between 19 years of</p> <p>23 experience and 21 years of experience?</p> <p>24 MR. GAGE: Objection.</p> <p>25</p>

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<p style="text-align: right;">Page 46</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. No.</p> <p>3 Q. And how about between 23 years of</p> <p>4 experience versus 25 years of experience?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. No.</p> <p>7 Q. Did Google provide you with any</p> <p>8 guidance on how number of years of experience</p> <p>9 would be evaluated for purposes of leveling?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. Sorry, could you repeat that question</p> <p>12 again?</p> <p>13 Q. Sure. Did Google provide you with</p> <p>14 any guidance about how number of years of work</p> <p>15 experience would be evaluated for purposes of</p> <p>16 leveling?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I believe the documentation is purely</p> <p>19 a guide and it's -- it's a guideline; it not</p> <p>20 concrete.</p> <p>21 Q. And did Google provide you with any</p> <p>22 guidance on how to consider years of experience</p> <p>23 when individuals were being hired for the same</p> <p>24 role?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 48</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. So in place of a hiring committee the</p> <p>3 packet, the candidate packet, would be submitted</p> <p>4 to the team you see here, CESO, for SVP review.</p> <p>5 Concurrently to that, the packet would also be put</p> <p>6 in front of Diane Greene to review.</p> <p>7 Q. Did Ms. Greene review all the packets</p> <p>8 for the technical director candidates?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. I do not know if she reviewed them.</p> <p>11 She had access to them.</p> <p>12 Q. Okay, and so this paragraph states</p> <p>13 that, "A levelling rationale is typically crafted</p> <p>14 by the recruiter and the hiring manager together."</p> <p>15 Was the leveling rationale always included in the</p> <p>16 packet?</p> <p>17 A. Yes.</p> <p>18 Q. And what information did you</p> <p>19 understand to be included in the levelling</p> <p>20 rationale?</p> <p>21 A. Typically the leveling rationale</p> <p>22 would come from the hiring manager. So in this</p> <p>23 instance, it would be Will Grannis and he would</p> <p>24 essentially write between one sentence and four to</p> <p>25 five sentences on his opinion of where a candidate</p>
<p style="text-align: right;">Page 47</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. Again, years of experience is one</p> <p>3 factor.</p> <p>4 Q. Okay. So going back to this</p> <p>5 document, let me know when you have that opened.</p> <p>6 A. I do.</p> <p>7 Q. Okay.</p> <p>8 MR. GAGE: Are we still on Tab 164?</p> <p>9 MS. GELFAND: Yes.</p> <p>10 MR. GAGE: Okay.</p> <p>11 Q. The second bullet point says</p> <p>12 "Independent Review" and you can read through that</p> <p>13 if you need to refresh your recollection about</p> <p>14 this policy, but my question for you is: Was this</p> <p>15 process in place at the time that you were</p> <p>16 recruiting for the technical director role?</p> <p>17 A. I will just read it, if that's okay.</p> <p>18 Q. Sure.</p> <p>19 A. Okay. So for Level 8 candidates,</p> <p>20 Level 8-plus candidates, at the time I was hiring</p> <p>21 for the office of the CTO we did not have a hiring</p> <p>22 committee stage for these candidates.</p> <p>23 Q. Okay. So -- so then can you walk me</p> <p>24 through the process of hiring for the technical</p> <p>25 director role without the hiring committee?</p>	<p style="text-align: right;">Page 49</p> <p>1 - JENNIFER BURDIS -</p> <p>2 would sit level-wise.</p> <p>3 Q. Okay, and so you stated that Mr.</p> <p>4 Grannis would make a preinterview assessment of a</p> <p>5 candidate's level, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And so was this rationale in addition</p> <p>8 to that initial assessment?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. You can put that document</p> <p>11 aside.</p> <p>12 So did you have any role in the</p> <p>13 interviewing portion of the hiring process for the</p> <p>14 technical directors?</p> <p>15 A. Not outside of helping to coordinate</p> <p>16 the logistics.</p> <p>17 Q. Did you put together a panel of</p> <p>18 interviewers?</p> <p>19 A. Yes.</p> <p>20 Q. Did anyone else, in addition to you,</p> <p>21 select the interviewers?</p> <p>22 A. Yes.</p> <p>23 MR. GAGE: Objection.</p> <p>24 Q. And who was that?</p> <p>25 A. Will Grannis.</p>

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<p style="text-align: right;">Page 50</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Q. And what was the choice of</p> <p>3 interviewers based on?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. I don't fully understand the</p> <p>6 questions to answer.</p> <p>7 Q. So how did you and Mr. Grannis decide</p> <p>8 who would be on the panel of interviewers for the</p> <p>9 technical director's role?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. You would need to ask --</p> <p>12 MR. GAGE: She said -- yeah, I don't</p> <p>13 think she said she did it.</p> <p>14 A. -- Will.</p> <p>15 Q. And do you know if the same panel of</p> <p>16 interviewers were used for all candidates for that</p> <p>17 role?</p> <p>18 A. The panels were not identical. There</p> <p>19 was a lot of crossover, but due to the logistics</p> <p>20 side and scheduling constraints we had a pool of</p> <p>21 interviewers that we selected from.</p> <p>22 Q. Okay, and do you know what the choice</p> <p>23 of interviewers was based on?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. You would need to ask Will.</p>	<p style="text-align: right;">Page 52</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Q. Is that no? Sorry, you cut out.</p> <p>3 A. No, I do not recognize it.</p> <p>4 Q. Have you ever seen anything like</p> <p>5 this?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. No.</p> <p>8 Q. Okay. So you're not aware if any</p> <p>9 L 8-plus assessment-based interview questions were</p> <p>10 used for the technical director role?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. I am not aware.</p> <p>13 Q. Are you aware -- did the questions</p> <p>14 differ at all based on whether someone was being</p> <p>15 considered as a Level 8 or a Level 9?</p> <p>16 A. Not to my knowledge.</p> <p>17 Q. Okay. So speaking specifically about</p> <p>18 the technical director's position, was the</p> <p>19 decision to make an offer to a candidate made</p> <p>20 after all of the interviewers' interviews were</p> <p>21 complete?</p> <p>22 A. Correct.</p> <p>23 Q. And who made the decision to extend</p> <p>24 an offer?</p> <p>25 A. We receive -- the recruiter receives</p>
<p style="text-align: right;">Page 51</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Q. Was Mr. Grannis on the panel for</p> <p>3 these candidates?</p> <p>4 A. He met with every candidate.</p> <p>5 Q. Do you know if Mr. -- if Brian</p> <p>6 Stevens met with every candidate?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. No.</p> <p>9 Q. Who came up with the questions that</p> <p>10 would be asked on these interviews?</p> <p>11 A. Will Grannis.</p> <p>12 Q. And were assessment-based interview</p> <p>13 questions used for all of the candidates?</p> <p>14 A. I don't fully understand the</p> <p>15 question, "assessment-based interview questions."</p> <p>16 Q. Sure. You know, maybe I will -- I'm</p> <p>17 going to be adding a document to the Box, so you</p> <p>18 can look at that. We just need one second.</p> <p>19 Okay, you should see it now in the</p> <p>20 Box. It's going to be Tab 189 and we're going to</p> <p>21 mark -- this has been previously marked as Exhibit</p> <p>22 79. Let me know if you have that open.</p> <p>23 A. I do.</p> <p>24 Q. Do you recognize this document?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 53</p> <p>1 - JENNIFER BURDIS -</p> <p>2 notification of SVP approval and at that point</p> <p>3 you -- the recruiter can extend an offer.</p> <p>4 Q. So aside what was in GHire for the</p> <p>5 technical director position, did any interviewers</p> <p>6 tell you what their decision to hire someone was</p> <p>7 based on?</p> <p>8 A. Everything will be in GHire.</p> <p>9 Q. And did Will Grannis make a</p> <p>10 recommendation to the hiring committee?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. There was no hiring committee.</p> <p>13 Q. And so you would assess Mr. Grannis'</p> <p>14 recommendation as well as the interviewers to</p> <p>15 determine whether to extend an offer?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. My extending the offer was purely</p> <p>18 based on SVP approval.</p> <p>19 Q. And the SVP would review the package</p> <p>20 that you prepared?</p> <p>21 A. Correct.</p> <p>22 MR. GAGE: Objection.</p> <p>23 Q. So who made the decision about what</p> <p>24 level a candidate for technical director would be</p> <p>25 hired at?</p>

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<p style="text-align: right;">Page 54</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. Many people through the process.</p> <p>2 Q. And who are those?</p> <p>3 A. The final decision would be the SVP</p> <p>4 to review and approve, but the checkpoints of</p> <p>5 deciding where a candidate would reside level-wise</p> <p>6 through the process would include the recruitment</p> <p>7 team, the interview panel, the hiring manager, and</p> <p>8 the two SVP reviewers.</p> <p>9 Q. And who was the SVP in this -- in</p> <p>10 this, for the technical director position?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. Diane Greene had access to Ulku's</p> <p>13 packet or Holtz and Sridhar. The two additional</p> <p>14 SVPs were Urs, U-R-S, Holtz and Sridhar. I can't</p> <p>15 recall his last name enough to be accurate.</p> <p>16 Sridhar, S-R-I-D-H-A-R. Sridhar.</p> <p>17 Q. So who made the final decision with</p> <p>18 respect to Ms. Rowe's level?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. The SVP I just listed.</p> <p>21 Q. And was that doc -- was that decision</p> <p>22 documented anywhere?</p> <p>23 A. Yes, in GHire.</p> <p>24 Q. And did Mr. Grannis make a final</p> <p>25</p>	<p style="text-align: right;">Page 56</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 Will where we discussed all candidates in process</p> <p>2 and that conversation may have taken place</p> <p>3 verbally.</p> <p>4 Q. Okay. I would like us to go back to</p> <p>5 the Box. I'm adding another document. Give me</p> <p>6 one second.</p> <p>7 Okay. You should see in the</p> <p>8 Box, Tab 160 and this -- this document has been</p> <p>9 previously marked as Exhibit 62. Let me know when</p> <p>10 you have that open.</p> <p>11 A. I have that open.</p> <p>12 MR. GAGE: You said 1-6-0, Shira?</p> <p>13 MS. GELFAND: Tab 1-6-0.</p> <p>14 MR. GAGE: Yup, okay.</p> <p>15 MS. GELFAND: Okay.</p> <p>16 Q. Do you recognize this document?</p> <p>17 A. There's not -- I may have seen it in</p> <p>18 the past, but I don't recall.</p> <p>19 Q. Is this part of Google's leveling</p> <p>20 policy?</p> <p>21 A. I would assume so based on the title.</p> <p>22 Q. Okay. So the document says, "What</p> <p>23 the leveling rationale by staffers includes and</p> <p>24 using the template below, you'll include the</p> <p>25</p>
<p style="text-align: right;">Page 55</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 recommendation for what level --</p> <p>2 MR. GAGE: Objection.</p> <p>3 Q. -- for what level Ms. Rowe would be</p> <p>4 hired in at?</p> <p>5 A. Yes.</p> <p>6 Q. Did he tell you what he based his</p> <p>7 decision on?</p> <p>8 A. He based his decision on the</p> <p>9 assessment throughout the process of Ulku Rowe's</p> <p>10 level.</p> <p>11 Q. And did he document that anywhere?</p> <p>12 A. His recommendation is documented in</p> <p>13 the offer packet.</p> <p>14 Q. Did you play any role in deciding</p> <p>15 what level a technical director would be hired at?</p> <p>16 A. No.</p> <p>17 MR. GAGE: Objection.</p> <p>18 Q. Okay, and outside of what Mr. Grannis</p> <p>19 documented in the offer packet, did he communicate</p> <p>20 with you what his leveling recommendation was</p> <p>21 based on?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. I don't recall specific</p> <p>24 conversations, but I had a weekly meeting with</p> <p>25</p>	<p style="text-align: right;">Page 57</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 following in every packet." So Number 1 says,</p> <p>2 "The reason the interview rubric level was</p> <p>3 chosen." Do you see that?</p> <p>4 A. I do.</p> <p>5 Q. Did you include this in every packet?</p> <p>6 A. I would like to know if this document</p> <p>7 was released at the same time as the concerned</p> <p>8 policy in August, 2019 because that was a long</p> <p>9 time after Ulku's process.</p> <p>10 Q. So this policy may not have been in</p> <p>11 place at that time?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. Potentially.</p> <p>14 Q. Okay. So my question is for you</p> <p>15 whether you included the preinterview rubric level</p> <p>16 in every packet at that time.</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I don't fully understand the</p> <p>19 question. Sorry.</p> <p>20 Q. So my, you know, my understanding is</p> <p>21 that this policy may not have been in place at the</p> <p>22 time that you were recruiting for the technical</p> <p>23 director role. So my question for you is whether</p> <p>24 or not this policy was in place, whether in every</p> <p>25</p>



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<p style="text-align: right;">Page 86</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>8 MR. GAGE: Objection.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>15 Q. And did MS. GELFAND provide any sort</p> <p>16 of feedback about Mr. Harteau's candidacy?</p> <p>17 A. I do not recall.</p> <p>18 Q. And who was her -- who was Ms.</p> <p>19 Greene's recruiter that sent you that</p> <p>20 notification?</p> <p>21 A. Her name was Roopa, R-O-O-P-A. I</p> <p>22 would need to look up the spelling of her last</p> <p>23 name. I don't remember the spelling. I don't</p> <p>24 recall her last name, no.</p> <p>25 Q. Did you have any discussions with</p>	<p style="text-align: right;">Page 88</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I do not know.</p> <p>2 Q. And you were the recruiter for Ben</p> <p>3 Wilson?</p> <p>4 A. I was.</p> <p>5 Q. And so what was the basis for the</p> <p>6 decision to hire Mr. Wilson as a Level 9?</p> <p>7 A. The same assessment criteria will</p> <p>8 have been used for Ben's initial screening process</p> <p>9 like all candidates through the process. Ben was</p> <p>10 an industry vertical ex -- expert in the</p> <p>11 technology space and a C-level executive.</p> <p>12 Q. So your recommendation was -- sorry,</p> <p>13 one second.</p> <p>14 Did you document those -- that</p> <p>15 criteria anywhere?</p> <p>16 A. I don't remember if I documented</p> <p>17 anywhere, but if I did it would be in GHire.</p> <p>18 Q. And did you have any conversations</p> <p>19 with anyone about this criteria?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. It's possible that Will and I spoke</p> <p>22 during our weekly meeting about them.</p> <p>23 Q. Do you recall any specific</p> <p>24 conversations with Mr. Grannis about Mr. Wilson?</p> <p>25</p>
<p style="text-align: right;">Page 87</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 Diane Greene about Mr. Harteau?</p> <p>2 A. No.</p> <p>3 Q. Did MS. GELFAND provide any sort of</p> <p>4 leveling recommendation for Mr. Harteau?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Not to my knowledge.</p> <p>7 Q. So that notification from Diane</p> <p>8 Greene's recruiter, what would have been included</p> <p>9 in that?</p> <p>10 MR. GAGE: Objection, asked and</p> <p>11 answered.</p> <p>12 A. Approval for additional SVP review.</p> <p>13 Q. Okay. Did you have any conversations</p> <p>14 with Diane Greene at any point about the technical</p> <p>15 director or the technical director's role?</p> <p>16 A. No.</p> <p>17 Q. Okay. Were you the recruiter for</p> <p>18 Evren Eryurek?</p> <p>19 A. I was not, no.</p> <p>20 Q. Were you at all involved in his</p> <p>21 hiring?</p> <p>22 A. No.</p> <p>23 Q. So you don't know the basis for the</p> <p>24 decision to hire him as a Level 9?</p> <p>25</p>	<p style="text-align: right;">Page 89</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I do not.</p> <p>2 Q. Okay. So what was the business</p> <p>3 necessity served in tying then the vertical</p> <p>4 industry expertise to the determination of his</p> <p>5 level?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. If I think I understand the question</p> <p>8 correctly, there were no concrete guidelines</p> <p>9 around time spent in roles.</p> <p>10 Q. Do you know whether Mr. Grannis</p> <p>11 analyzed the business necessity for these -- for</p> <p>12 this leveling decision?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. You would need to ask Will.</p> <p>15 Q. Okay. So you don't know?</p> <p>16 A. No.</p> <p>17 Q. Okay. Do you know what factors</p> <p>18 Google considered in setting Mr. Wilson's base</p> <p>19 compensation?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. You would need to ask Chris Humez,</p> <p>22 the compensation analyst.</p> <p>23 Q. So you don't know?</p> <p>24 A. I do not know.</p> <p>25</p>